

SHANNON LISS-RIORDAN (SBN 310719)  
(sliss@llrlaw.com)  
THOMAS FOWLER (*pro hac vice* forthcoming)  
(tfowler@llrlaw.com)  
LICHTEN & LISS-RIORDAN, P.C.  
729 Boylston Street, Suite 2000  
Boston, MA 02116  
Telephone: (617) 994-5800  
Facsimile: (617) 994-5801

*Attorneys for Plaintiff Francisco Rodriguez*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

FRANCISCO RODRIGUEZ, on behalf of  
himself and all others similarly situated,

Plaintiff,

v.

TWITTER, INC. and PRO UNLIMITED,  
INC.,

Defendants.

CASE NO. 3:22-cv-7222-JD

Assigned to The Honorable James Donato

**JOINT STIPULATION TO EXTEND  
BRIEFING SCHEDULE ON DEFENDANTS'  
MOTIONS TO COMPEL ARBITRATION AND  
STRIKE AND/OR DISMISS CLASS CLAIMS**

WHEREAS, Plaintiff Francisco Rodriguez filed his Complaint on November 16, 2022;

WHEREAS, Defendant Pro Unlimited, Inc. (“Pro Unlimited”) filed a Motion to Compel Arbitration of Plaintiff’s Individual Claims and Strike and/or Dismiss Class Claims on January 11, 2023 (Dkt. 26);

WHEREAS, Defendant Twitter, Inc. (Twitter) filed a Motion to Compel Arbitration and Strike and/or Dismiss Class Claims on January 11, 2023 (Dkt. 27);

WHEREAS, the deadline for Plaintiff to respond to the motions submitted by Pro Unlimited and Twitter is currently January 25, 2023.

WHEREAS, the parties have conferred and agreed to an extended briefing schedule in order to accommodate the schedules of the parties’ counsel;

WHEREAS, the Court issued a Related Case Order (Dkt. 30) determining that this case is related to Cornet v. Twitter, Inc., 22-cv-07222-TLT and reassigning this matter to the Honorable James Donato.

WHEREAS, the Related Case Order (Dkt. 30) vacated the hearing date for these motions, which was previously set for March 14, 2023.

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties and their respective counsel, that Plaintiff will respond to Pro Unlimited’s and Twitter’s motions on or before February 8, 2023. Defendants Pro Unlimited and Twitter will submit their replies in support of their motions on or before February 22, 2023.

Dated: January 24, 2023

LICHTEN & LISS-RIORDAN, P.C.

By: /s/ Shannon Liss-Riordan

Shannon Liss-Riordan

Attorneys for Plaintiff

FRANCISCO RODRIGUEZ

Dated: January 24, 2023

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Eric Meckley

Eric Meckley

Attorneys for Defendant

TWITTER, INC.

1  
2 Dated: January 24, 2023

GREENBERG TRAURIG, LLP

3  
4 By: /s/ Ashley Farrell Pickett  
Ashley Farrell Pickett  
5 Attorneys for Defendant  
6 PRO UNLIMITED, INC.

7 **FILER ATTESTATION**

8 Pursuant to Civil Local Rule 5-1(i)(3), the filer attests that the concurrence in the filing of this  
9 document has been obtained from the stipulating parties.

10  
11 Dated: January 24, 2023

LICHTEN & LISS-RIORDAN, P.C.

12  
13 By: /s/ Shannon Liss-Riordan  
Shannon Liss-Riordan  
14 Attorneys for Plaintiff

15 **CERTIFICATE OF SERVICE**

16  
17 I, Shannon Liss-Riordan, hereby certify that a true and accurate copy of this document  
18 was served on counsel for Defendant Pro Unlimited, Inc. and Twitter, Inc. via the CM/ECF system on  
19 January 24, 2023.

20  
21 Dated: January 24, 2023

LICHTEN & LISS-RIORDAN, P.C.

22  
23 By: /s/ Shannon Liss-Riordan  
Shannon Liss-Riordan  
24 Attorneys for Plaintiff

**[PROPOSED] ORDER**

Pursuant to the parties' Joint Stipulation and for GOOD CAUSE appearing, the Court hereby order the following briefing schedule on Defendants' respective Motions to Compel Arbitration and Dismiss and/or Strike Class Claims:

- Plaintiff's oppositions to Defendants' motions shall be submitted on or before February 8, 2023.
- Defendants' replies in support of their motions shall be submitted on or before February 22, 2023.

The Court hereby sets the hearing date on Defendants' motions as \_\_\_\_\_.

Dated:

\_\_\_\_\_  
Hon. James Donato  
District Court Judge